<u>REMARKS</u>

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-27 are pending in the present application. Claims 1, 6, 11, 16, and 20 are amended, without introduction of new matter, by the present amendment.[1]

In the outstanding Office Action, Claims 1-27 were rejected under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 6,333,750 to <u>Odryna et al.</u> (hereinafter "<u>Odryna</u>") in view of U.S. Patent No. 6,157,415 to <u>Glen</u> (hereinafter "<u>Glen '415</u>") and U.S. Patent No. 6,268,847 to <u>Glen</u> (hereinafter "<u>Glen '847</u>"). That rejection is respectfully traversed.

Amended Claim 1 recites a plurality of digital decoders configured to digitally decode a plurality of image signals; an image selector configured to directly receive outputs from each of the plurality of digital decoders and configured to select from among the plurality of digitally decoded image signals one (1) reference image signal and (n-1) number of superimposing image signals; and a plurality of resolution converters configured to directly receive the selected image signals output from the image selector, such that each resolution converter can input any of the respective outputs, to convert resolutions of the n number of selected image signals into respective adjustable desired resolutions, and to output the converted image signals to an image synthesizer. Claim 1 further recites that the image selector is configured to connect each of the digital decoders to any of the resolution converters. Independent Claims 11, 16, and 20 recite similar subject matter. The remaining claims depend from Claims 1, 11, 16, and 20.

The Office Action cites <u>Odryna's</u> broadcast video decoders 182 (of respective input cards A-C) as teaching the claimed plurality of digital decoders; cites a conglomeration of <u>Odryna's</u> control block 111 (of system input card 10), serial control bus 113, and the

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[1] For support, see the amended claims as originally-filed; and Applicants' specification, page 11, lines 12-19.

memories 186 and control arrays 188 (of respective input cards A-C) as teaching the claimed

image selector; and cites Odryna's scalers 184 (of respective input cards A-C) as teaching the

claimed plurality of resolution converters.

The Office Action further cites Glen '415 as rendering obvious the claimed

connection of each digital decoder to any of the resolution converters, because Glen '415

teaches a plurality of digital decoders 82, 90 of Figure 8 as each outputting to a switch matrix

140 of Figure 9; and teaches the switch matrix 140 as outputting to any of a plurality of color

base converting modules 102 of Figure 9.[2] Though the Office Action explains how the above

connection of Glen '415 could be employed to modify Odryna, the Office Action does not

explain why one skilled in the art would be motivated to modify Odryna in such a manner.

Rather, the Office Action merely reiterates the configuration of Glen '415's digital decoders

82, 90, switch matrix 140, and base converting module 102 by stating, "One having ordinary

skill in the art would have been motivated to do this because it would have provided a

switching scheme for the conversion of the image output signals from one of the decoders

and for the subsequent multistage synthesis for overlaying the portions of the input images

(Glen-415 column 3-4)."[3] Respectfully, the above comment does not clarify why Odryna

should employ such a "switching scheme".

Applicants note that one skilled in the art would not be motivated to make the

proposed modification because such a switching scheme would render Odryna's video

graphics systems unsatisfactory for its intended purpose; and would change a principle

operation of the system. More particularly, by directing signals from each decoder 182 (e.g.,

of input card A) to any scaler 184 (e.g., of input card C), the proposed modification would

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[2] The Office Action also cites Glen '847 as rendering obvious the claimed connection of each digital decoder to any of the resolution converters. Respectfully, Applicants cannot understand the Office Action's remarks with respect to Glen '847. Accordingly, if the rejection is not withdrawn in view of the Applicants' remarks, Applicants respectfully request further clarification as to how Glen '847 renders obvious the claimed connection.

[3] Office Action, 3/23/2005, page 6.

obviate the intended integration of signal decoding and conversion of an input signal within a single input card (i.e., full processing within each card). In fact, the proposed modification would require the passing of an input signal amongst multiple "input" cards A-C. Odryna's Figure 17 precludes such a passing of signals amongst the input cards. Thus, for instance, a scaler 184 can process a signal input to its respective card, but the same scaler 184 cannot process a signal input to another input card.
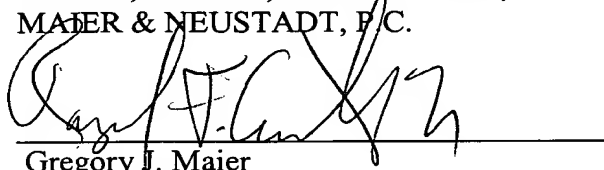
Moreover, the proposed combination of Odryna and the Glen references does not teach the claimed "plurality of resolution converters configured to directly receive the selected image signals output from the image selector, such that each resolution converter can input any of the respective outputs, to convert resolutions of the n number of selected image signals into respective **adjustable** desired resolutions" (emphasis added). The Office Action cites Glen '415's color base converting module 102 and blend module 76, 78, 80 as teaching the claimed resolution converters. However, as shown in Glen '415's Figure 3, the blend module 76, 78, 80 receives an image signal in one of three predetermined formats, i.e., RGB, HDTV, and TV, and then outputs the image signal in another one of the same three predetermined formats. Thus, Glen '415's color base converting module 102 and blend module 76, 78, 80 cannot teach the claimed resolution converters, which convert image signals into "respective adjustable desired resolutions".

Accordingly, for the above-stated reasons, Applicants respectfully request that the rejection of Claims 1-27 under 35 U.S.C. 103(a) as unpatentable over Odryna in view of Glen '415 and Glen '847 be withdrawn.

Consequently, in light of the above discussion and in view of the present amendment,

the present application is believed to be in condition for allowance, and an early and

favorable action to that effect is respectfully requested.

Respectfully submitted,

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